

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SAUNTORE THOMAS, *an individual*

Plaintiff,

vs.

**ENTERPRISE LEASING COMPANY
OF DETROIT, LLC,**

Defendant.

Case No. 19-cv-11550
Hon. Mark A. Goldsmith
Mag. Mona K. Majzoub

**DEFENDANT'S FILING WITH RESPECT TO
EXPERT WITNESS LIST, DISCLOSURES, AND REPORTS**

On the basis that Plaintiff has not identified any experts, Defendant submits the following list of expert witnesses who may be called to testify at trial only to the extent that Plaintiff calls any doctor or professional to testify as to Plaintiff's alleged likely future emotional condition:

- 1) Every physician or health care professional with whom plaintiff has ever consulted or been examined, evaluated or treated, (and their representatives and records custodians);
- 2) Every psychologist, psychiatrist, counselor, social worker, clergyperson, or mental health care professional with whom plaintiff has ever consulted or been examined, evaluated or treated, (and their representatives and records custodians); and
- 3) Any necessary rebuttal expert witnesses.

LOCAL RULE CERTIFICATION: I, James S. Rosenfeld, certify that this document complies with Local Rule 5.1(a), including: double-spaced (except for quoted materials and footnotes); at least one-inch margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I also certify that it is the appropriate length. Local Rule 7.1(d)(3).

Respectfully submitted,

By: /s/James S. Rosenfeld
Carey A. DeWitt (P36718)
James S. Rosenfeld (P39434)
Attorneys for Defendant
41000 Woodward Avenue,
Stoneridge West Bldg.
Bloomfield Hills, MI 48304
Telephone: 248.258.1616
dewitt@butzel.com
rosenfeld@butzel.com

Dated: December 24, 2019

CERTIFICATE OF SERVICE

I hereby certify that on December 24, 2019, I caused the electronic filing of the foregoing paper with the Court using the Court's ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ James S. Rosenfeld
Carey A. DeWitt (P36718)
James S. Rosenfeld (P39434)
Attorneys for Defendant
41000 Woodward Avenue,
Stoneridge West Bldg.
Bloomfield Hills, MI 48304
Telephone: 248.258.1616
dewitt@butzel.com
rosenfeld@butzel.com